

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON  
NELSON; CASEY KIRSCHNER;  
ALLCORE DEVELOPMENT LLC;  
FINBRIT HOLDINGS LLC; CHESHIRE  
VENTURES LLC; 2010 IRREVOCABLE  
TRUST; SIGMA REGENERATIVE  
SOLUTIONS LLC; CTBSRM, INC.;  
RODNEY ATHERTON; DEMETRIUS VON  
LACEY; RENRETS LLC,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader  
Plaintiff, Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants,  
Interpleader Counter-Plaintiffs.

**DECLARATION OF AMANDA J. STERLING IN SUPPORT OF PLAINTIFFS'  
RESPONSE TO MOTION TO VACATE PRELIMINARY INJUNCTION**

I, Amanda J. Sterling, declare under penalty of perjury as follows:

1. I am a member in good standing of the District of Columbia Bar and the New York Bar. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP, and counsel for Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, “Amazon” or “Plaintiffs”) in the above-captioned action. I submit this declaration in support of Plaintiffs’ Response to Watson Defendants’ Motion to Vacate Preliminary Injunction, solely to put documents before the Court.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a publicly filed Declaration of M. Brent Byars in Support of Plaintiff Epic Games, Inc.’s Motion for a Preliminary Injunction in *Epic Games, Inc. v. Apple Inc.*, No. 20-cv-05640-YGR (N.D. Cal. Sept. 4, 2020) (ECF No. 61-1).

3. Attached hereto as **Exhibit 2** is a true and correct copy of transcript excerpts from the deposition of Christian Kirschner, which took place on February 18, 2022.

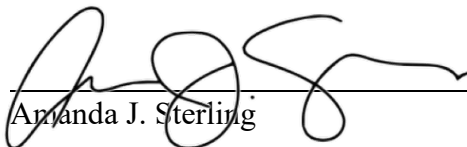
4. Attached hereto as **Exhibit 3** is a true and correct copy of transcript excerpts from the deposition of Kyle Ramstetter, which took place on February 17, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of transcript excerpts from the deposition of Will Camenson, which took place on February 28, 2022.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a PDF version of a document that was produced by Plaintiffs in native format on May 17, 2022 bearing the Bates number AMZ-CVL-078596.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on May 20, 2022.

  
Amanda J. Sterling